

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:
BRANDON L HEITMANN

CHAPTER 13
CASE NO. 24-41956-MAR
JUDGE MARK A RANDON

Debtor _____ /

**TRUSTEE'S OBJECTION TO DEBTOR'S APPLICATION TO EMPLOY KOTZ SANGSTER
WYSOCKI PC AS SPECIAL COUNSEL**

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and objects to the Debtor's Application to Employ Kotz Sangster Wysocki PC as Special Counsel as follows:

1. Trustee objects to debtor's failure to comply with the notice and service requirements pursuant to E. D. Mich. LBR 9014-1(c).
2. Trustee objects as there is no apparent benefit to the debtor or the estate to incur attorney fees to defend state court cases that are stayed by the filing of this Chapter 13. Debtor's Amended Plan filed at Dkt#42, filed on 5/13/2024 is an unsecured base plan estimated to yield only \$3,333.60 to unsecured creditors. Debtor has a 0% payment history and is delinquent in plan payments in the amount of \$12,228.36.
3. Trustee notes that Macomb County Case, 23-002737-CZ, referenced in paragraph 1 of the motion is listed as "Concluded" in that Statement of Financial Affairs, paragraph 9.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny the relief requested.

Dated: May 15, 2024

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ KRISPEN S. CARROLL-mcs

Krispen S. Carroll (P49817)

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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed the **Trustee's Objection to Debtor's Application to Employ Kotz Sangster Wysocki PC as Special Counsel** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

ROBERT N BASSEL
P O BOX T
CLINTON, MI 49236

May 15, 2024

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit
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